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**BEFORE THE ARIZONA POWER PLANT AND
TRANSMISSION LINE SITING COMMITTEE**

IN THE MATTER OF THE APPLICATION
OF SUNZIA TRANSMISSION LLC, IN
CONFORMANCE WITH THE
REQUIREMENTS OF ARIZONA
REVISED STATUTES 40-360, ET SEQ.,
FOR A CERTIFICATE OF
ENVIRONMENTAL COMPATIBILITY
AUTHORIZING THE SUNZIA
SOUTHWEST TRANSMISSION
PROJECT, WHICH INCLUDES THE
CONSTRUCTION OF TWO NEW 500 KV
TRANSMISSION LINES AND
ASSOCIATED FACILITIES
ORIGINATING AT A NEW SUBSTATION
(SUNZIA EAST) IN LINCOLN COUNTY,
NEW MEXICO, AND TERMINATING AT
THE PINAL CENTRAL SUBSTATION IN
PINAL COUNTY, ARIZONA. THE
ARIZONA PORTION OF THE PROJECT
IS LOCATED WITHIN GRAHAM,
GREENLEE, COCHISE, PINAL, AND
PIMA COUNTIES.

DOCKET NO. L-00000YY-15-0318-
00171

Case No. 171

**NOTICE OF LODGING EXHIBITS
NOS. WIN1 THROUGH WIN22
OF WINKELMAN NATURAL
RESOURCE CONSERVATION
DISTRICT**

Arizona Corporation Commission

DOCKETED

OCT 13 2015

DOCKETED BY

RAM

Pursuant to R14-3-211 and paragraphs 16 and 17 of the September 11,
2015 Procedural Order, Winkelman Natural Resource Conservation District, by
and through their counsel, Lat J. Celmins of Margrave Celmins, P.C. hereby
submits Exhibits Nos. WIN1 through WIN22 on behalf of Winkelman Natural
Resource Conservation District in this proceeding.

DOCKET CONTROL
AZ CORP COMMISSION

2015 OCT 13 P 4:55

RECEIVED

Docket No. L-00000YY-15-0318-00171

1 Respectfully submitted this 13 day of October, 2015.

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3 By 

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10 **CERTIFICATION OF MAILING**

11 Pursuant to A.A.C. R14-3-204, the original Exhibits Nos. WIN1 through
12 WIN22 filed on behalf of Winkelman Natural Resource Conservation District this
13 13 day of October with:

14 Utilities Division-Docket Control

15 **ARIZONA CORPORATION COMMISSION**

16 1200 West Washington Street

17 Phoenix, Arizona 85007

18 **Copy** of the foregoing mailed this 13 day of October, 2015 to:

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20 Assistant Attorney General

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Exhibit Table of Contents

Win 00	Winkelman NRCD Testimony
Win 01	Biography William Dunn
Win 02	Districts as Political Subdivisions
Win 03	Statutory Responsibilities
Win 04A	NRCS-WNRD History
Win 04B	WNRCD District Land Units Map
Win 05A	WNRCD District Ownership Map
Win 05B	WNRCD District Land Percentages Breakdown
Win 05C	WNRCD District Geology Map
Win 05D	Best Management Practices (BMP) – Sonoran Desert Tortoise
Win 06A	Mission Statement
Win 06B	Land & Resource Management Plan
Win 06C	Major Corridors Policy
Win 06D	Customs & Culture Policy
Win 07	Projects-Activities Ongoing
Win 08	Projects Planned
Win 09	Projects Completed
Win 10	Resource Concerns
Win 11A	MOU WNRCD & BLM (Safford)
Win 11B	MOU Coordinated Resource Management
Win 12A	Sunzia Map Panel G-Segment 4
Win 12B	Sunzia Map Panel D-Segment 4
Win 12C	Sunzia Map Panel F-Segment 4

Win 13	Segment 4 Environment-Resource Issues
Win 14	Segment 4 Environment-Resource Issues – Detail
Win 15A	Sunzia Maps Panel C-Segment 3
Win 15B	Sunzia Maps Panel B-Segment 3
Win 16	Segment 3 Environment-Resource Issues
Win 17	Segment 3 Environment-Resource Issues-Detail
Win 18	WNRCD Request for Assurances
Win 20	Revenue-Tax
Win 21	Locally Led Conservation
Win 22	Pipeline Corridor Erosion Photos

Biography

William Dunn, Chairman Winkelman NRCD

B.S. Management A.S.U

45 years of management experience, owner Dunn Ranches, Kearny, Az

40 years of natural resource management in the Winkelman District

12 years owner/operator, General Kearny Inn, Kearny, Az

President of the Arizona Association of Conservation Districts

Board member, Arizona Cattle Growers Association

Districts as Political Subdivisions

Irrigation and other districts as political subdivisions

Irrigation, power, electrical, agricultural improvement, drainage, and flood control districts, and tax levying public improvement districts, now or hereafter organized pursuant to law, shall be political subdivisions of the state, and vested with all the rights, privileges and benefits, and entitled to the immunities and exemptions granted municipalities and political subdivisions under this constitution or any law of the state or of the United States; but all such districts shall be exempt from the provisions of sections 7 and 8 of article IX of this constitution.

Statutory Responsibilities regarding conservation of lands, soils, water, wild life and habitat areas, and dealing with State agencies regarding development, coordination relating to resource conservation programs and proper utilization of lands.

A.R.S. §37-1001. Declaration of policy

It is declared the policy of the legislature to provide for the restoration and conservation of lands and soil resources of the state, the preservation of water rights and the control and prevention of soil erosion, and thereby to conserve natural resources, conserve wildlife, protect the tax base, protect public lands and protect and restore this state's rivers and streams and associated riparian habitats, including fish and wildlife resources that are dependent on those habitats, and in such manner to protect and promote the public health, safety and general welfare of the people.

A.R.S. §37-1053. Powers and duties of supervisors

A. The supervisors shall:

1. Provide for the keeping of a record of all proceedings, resolutions, regulations and orders issued or adopted.
2. Furnish to the commissioner copies of such ordinances, rules, regulations, orders, contracts, forms or other documents adopted or employed, audits of the district or education center and such information concerning their activities as the commissioner requests.

B. The supervisors may appoint additional advisory members to the district governing body and delegate to the chairman or any member, or to any agent or employee, such powers and duties as they deem proper.

C. District supervisors shall require and provide for the execution of a corporate surety bond in suitable penal sum for, and to cover, any person entrusted with the care or disposition of district funds or property.

D. The compensation of the district supervisors shall be determined by the supervisors meeting as the governing body of the district but shall not exceed the compensation prescribed by section 38611, plus actual and necessary expenses of attending district meetings, and a per diem subsistence allowance and actual and necessary expenses while engaged in official business by order of the supervisors.

A.R.S. §37-1054 Powers of district

A. This state recognizes the special expertise of the districts in the fields of land, soil, water and natural resources management within the boundaries of the district. A district is empowered to:

1. Conduct surveys, investigations and research relating to the character of the soil, soil erosion prevention within a farm or ranch, methods of cultivation, farm and range practices, seeding, eradication of noxious growths and any other measures that will aid farm and range operations, disseminate information pertaining thereto, and carry on research programs with or without the cooperation of this state or its agencies or the United States or its agencies.
2. Conduct demonstration projects within the district on lands owned or controlled by the state or any of its agencies with the consent and cooperation of the agency having

jurisdiction of the land, and on any other lands within the district on obtaining the consent of the landowner or the necessary rights or interests in the land, in order to demonstrate by example the means, methods and measures by which water, soil and soil resources may be conserved and soil erosion and soil washing may be prevented and controlled.

3. Cooperate and enter into agreements with a landowner, an operator or any agency or subdivision of the state or federal government to carry on programs of watershed improvement, soil erosion prevention, methods of cultivation, cropping practices, land leveling and improvement on agricultural lands, and programs limited to methods of proper range use, reseeding and the eradication of noxious growth on grazing lands, all within the limits of an individual farm or ranch and subject to the conditions the supervisors deem necessary.

4. Acquire, by purchase, exchange, lease or otherwise, any property, real or personal, or rights or interest in any property, maintain, administer and improve any properties acquired, receive income from any property or right or interest in property and expend it in carrying out the purposes of this chapter, and sell, lease or otherwise dispose of any property or interest in property in furtherance of the purposes of this chapter.

5. Make available, on the terms it prescribes to landowners within the district, agricultural and engineering machinery and equipment, fertilizer, seed and other material or equipment as will assist the landowners to carry on operations on their lands for the purposes and programs authorized by this chapter.

6. Develop, publish and bring to the attention of landowners within the district comprehensive plans for the conservation of soil and water resources within the district that specify in such detail as may be feasible the acts, procedures, performances and avoidances necessary or desirable for the effectuation of the plans.

7. Apply for, receive and spend monies from the Arizona water protection fund pursuant to title 45, chapter 12 to be used in individual districts or in cooperation with other districts, persons, cities, towns, counties, special districts and Indian communities for projects consistent with title 45, chapter 12.

8. Employ agents, engineers, attorneys or other employees not readily available from existing state agencies.

9. Sue and be sued in the name of the district, have a seal, which shall be judicially noticed, have perpetual succession unless terminated as provided in this chapter, may make and execute contracts and other instruments necessary or convenient to the exercise of its powers and make, amend and repeal rules not inconsistent with this chapter to carry into effect its purposes and powers.

10. Accept donations, gifts and contributions in money, services, materials or otherwise, and use or expend them in carrying on its operations.

11. Organize and establish an education center.

B. No provision of law with respect to the acquisition, operation or disposition of property by other public bodies shall be applicable to a district organized under this chapter unless specifically stated therein.

C. After the formation of any district under this chapter, all participation there under shall be voluntary, notwithstanding any provision of this chapter to the contrary.

D. A district may send to the Arizona water protection fund commission established by title 45, chapter 12 written recommendations for geographic areas to be emphasized, issues of concern and measures to implement title 45, chapter 12. A district that sends

written recommendations to the commission shall request information from at least the following:

1. The director of the department of water resources and the state land commissioner.
2. The federal and state fish, wildlife, recreation and natural resource agencies.
3. County and municipal entities.
4. The public.
- E. The district shall develop procedures to ensure adequate participation in the public involvement process prescribed by subsection D of this section.

A.R.S. §37-1056 Cooperation between districts

The supervisors of any two or more districts organized under the provisions of this chapter may cooperate in the exercise of any power conferred in this chapter.

A.R.S. §37-1057 Cooperation by state agencies

Agencies of this state which have jurisdiction over or are charged with the administration of any state owned lands, and of any county or other governmental subdivision of the state which have jurisdiction over, or are charged with the administration of, any county owned or other publicly owned lands lying within the boundaries of any natural resource conservation district, may cooperate fully with the supervisors of such districts in the effectuation of programs and operations undertaken by the supervisors under the provisions of this chapter. The supervisors of any district organized under the provisions of this chapter may cooperate with any municipality within the boundaries of the district on matters relating to soil conservation or land use planning.

A Brief History of the Natural Resource Conservation Service

With the election of Franklin D. Roosevelt as President in 1932, conservation of soil and water resources became a national priority in the New Deal administration. The National Industrial Recovery Act (P.L. 73-67) passed in June 1933 included funds to fight soil erosion. With this money, the Soil Erosion Service (SES) was established in the Department of Interior with Hugh Bennett as Chief in September 1933. SES established demonstration projects in critically eroded areas across the country to show landowners the benefits of conservation.

Perhaps no event did more to emphasize the severity of the erosion crisis in the popular imagination than the Dust Bowl. Beginning in 1932, persistent drought conditions on the Great Plains caused widespread crop failures and exposed the region's soil to blowing wind. A large dust storm on May 11, 1934 swept fine soil particles over Washington, D.C. and three hundred miles out into the Atlantic Ocean. More intense and frequent storms swept the Plains in 1935. On March 6 and again on March 21, dust clouds passed over Washington and darkened the sky just as Congress commenced hearings on a proposed soil conservation law. Bennett seized the opportunity to explain the cause of the storms and to offer a solution. He penned editorials and testified to Congress urging for the creation of a permanent soil conservation agency. The result was the Soil Conservation Act (PL 74-46), which President Roosevelt signed on April 27, 1935, creating the Soil Conservation Service (SCS) in the USDA.

After 1935, SCS expanded its soil conservation program nationwide with a several-fold increase in the number of demonstration projects. Labor provided by the Civilian Conservation Corps (CCC), the Civil Works Administration (CWA), and the Works Progress Administration (WPA) supported this work. SCS's technical experts worked to advance scientific understanding of erosion processes and to develop effective conservation practices. SCS's network of regional nurseries selected and increased the seeds and plants necessary for conservation work.

In 1936, the agency assumed responsibility for performing surveys and devising flood control plans for selected watersheds under the authority of the Flood Control Act of 1936 (P.L. 74-738). In 1938, in a major reorganization of USDA's land management program, the Secretary of Agriculture made SCS responsible for administering the Department's drainage and irrigation assistance programs, the snow survey and water supply forecasting program, as well as the Water Facilities, Land Utilization, and Farm Forestry programs. The addition of these responsibilities made SCS the USDA's lead private lands conservation agency.

As early as 1935 USDA managers began to search for ways to extend conservation assistance to more farmers. They believed the solution was to establish democratically organized soil conservation districts to lead the conservation planning effort at the local level. To create a framework for cooperation, USDA drafted the Standard State Soil Conservation Districts Law, which President Roosevelt sent to the governors of all the states in 1937. The first soil conservation district was organized in the Brown Creek watershed of North Carolina on August 4, 1937. Today, there over three thousand conservation districts across the country.

The decade after World War II was a time of growth for SCS. Congress increased appropriations for soil conservation programs. The Secretary made SCS the lead agency responsible for technical oversight of the "permanent" type conservation measures installed with cost-share funds under the Agricultural Conservation Program (ACP). During this time the number of soil conservation districts continued to increase, as did the number of cooperators working with SCS to develop conservation plans for their farms.

Arizona's Natural Resource Conservation Districts

Arizona passed its Conservation District Law in 1941. That legislation described its mission as follows: "It is declared the policy of the legislature to provide for the restoration and conservation of lands and soil resources of the state, the preservation of water rights and the control and prevention of soil erosion, and thereby to conserve natural resources, conserve wildlife, protect the tax base, protect public lands and protect and restore this state's rivers and streams and associated riparian habitats, including fish and wildlife resources that are dependent on those habitats, and in such manner to protect and promote the public health, safety and general welfare of the

people". Now, there are 41 districts in Arizona. Of the 41, 9 are Soil and Water Conservation Districts. (Administered under tribal law). NRCDs are political subdivisions of state government and are administered under state law through the Arizona State Land Department. However, districts operate independently of the State Land Department.

Winkelman Natural Resource Conservation District

The Winkelman Natural Resource Conservation District (WNRCD) was organized and became functional under the State of Arizona Soil Conservation District Law in October 1948. The Winkelman NRCD now includes approximately 1,609,470 acres, less than 1,500 acres is irrigated farmland. The remaining acres not within towns, cities or mine lands are rangeland. Residential areas include Oracle, San Manuel, Mammoth, Dudleyville, Winkelman, Kearny, and a small part of Catalina.

The stated goal of the Winkelman NRCD is "to support and encourage the proper and wise sustained use and management of our basic renewable and non-renewable natural resources utilizing sound science and valid on-ground experience."

The District is currently applying for grants offered by BLM & NRCS (RCPP). These grants would be used to restore native habitat (remove invasive plant species), protect endangered animals, reduce flooding, and improve water quality and quantity.

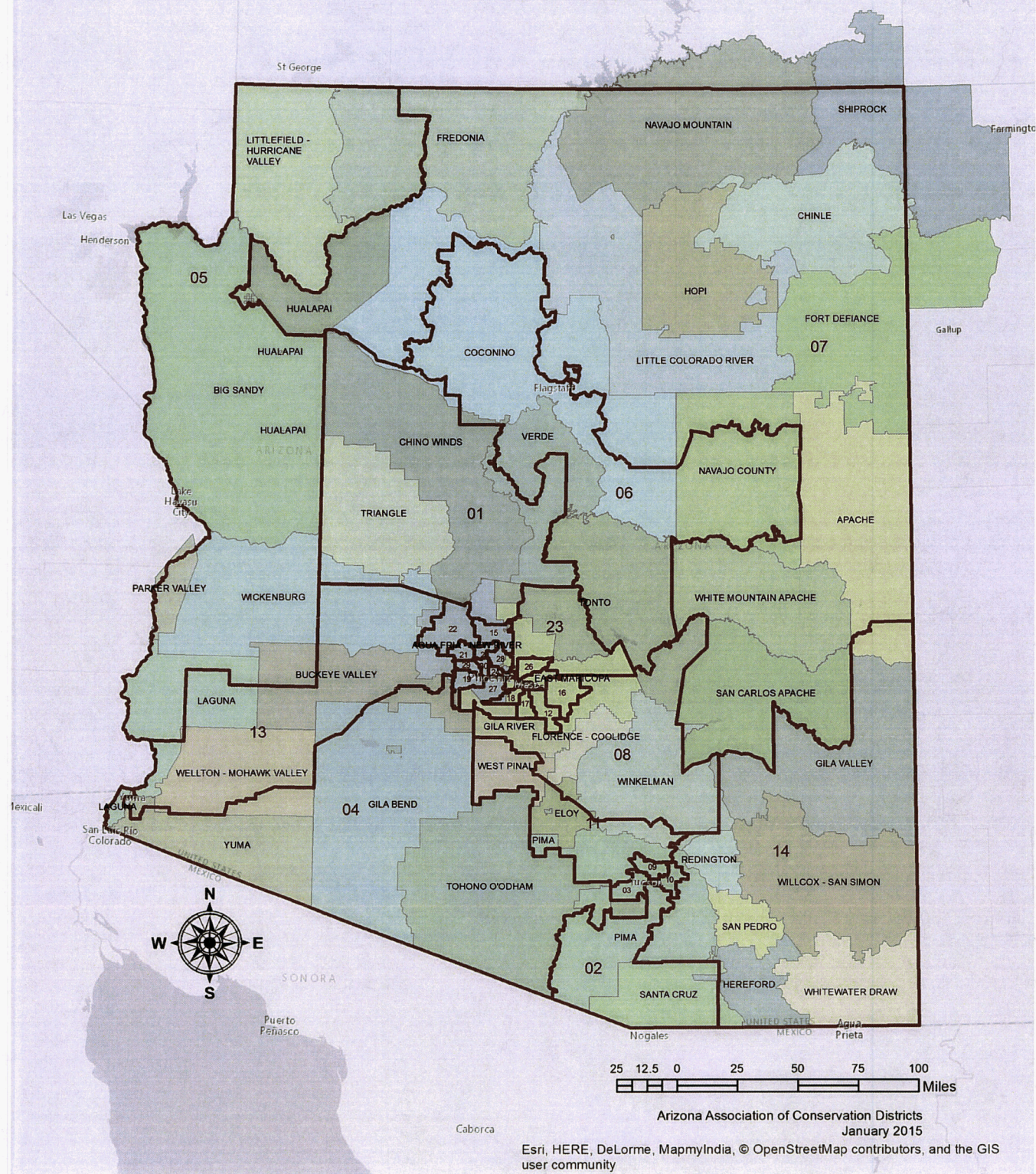
The District provides leadership to promote good management of the natural resources of the district through coordination, conservation and development programs resulting in the wise use of lands within the district. Land ownership is a combination of private, state, and federal lands. Land uses other than agriculture in the district include mining, recreation, urban areas, and preserves. Two major mining activities lie within the district, as well as two gypsum mines, and various sand and gravel operations. Recreation involves hunting, fishing, hiking, off-highway vehicular use, bird watching, camping, and sightseeing. Portions of the Tonto and Coronado National Forests lie within the district boundaries. The district also has Bureau of Land Management Lands (BLM), Arizona State Trust Lands (ASLD) and private lands.

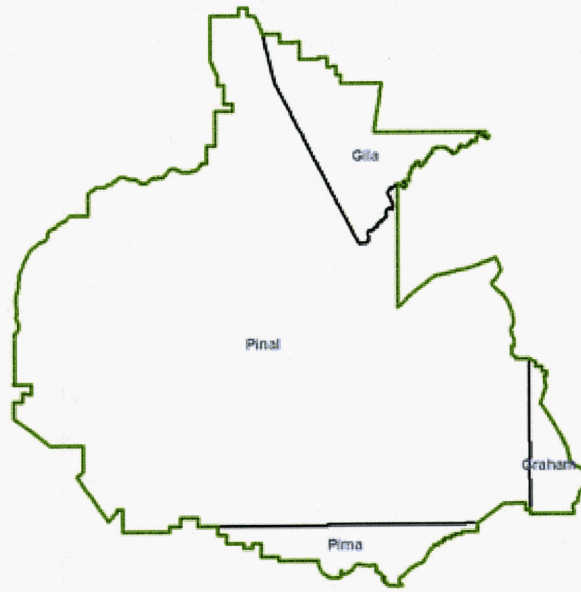
The Winkelman NRCD is located in the eastern part of Pinal County, the southwest corner of Gila County, a small area in the southwest corner of Graham County, and a small area in northeast Pima County. In the north lies the Pinal Mountains, to the east are the Galiuro Mountains, to the south are the Catalina Mountains, and to the west lies the desert land near Picacho Reservoir. Substantial portions of two of Arizona's major rivers, the San Pedro and the Gila, wind through the district.

As in other districts, the WNRCD has five supervisors, three of which are elected and two appointed by the State Land Commissioner. The current supervisors of the Winkelman NRCD are William Dunn, Francie Meyer, Gary Vinson, Carol DuBois, and Stephen Turcotte. All district supervisors are unpaid volunteers. Likewise, all cooperation with the district is strictly voluntary.

See maps on the next 2 pages.

Arizona's Conservation Districts and Legislative Districts





WNRCD counties

Land Percentages Breakdown

Agency Land Ownership/Field Office**BLM 270,709 acreage 17% of WNRCD**

Tucson	241,108	89%
Safford	29,601	11%

Forest Service 147,674 acreage 8% of WNRCD

Tucson	65,391	44%
Safford	24,659	17%
Globe	57,624	39%

State Land 904,998 acreage 56% of WNRCD

Phoenix	244,302	27%
Tucson	660,696	73%

Data Source: ArcMap Map Layer: "WNRCD Ownership".2011. USDA-NRCS

The WNRCD comprises 1,609,470 acres (2,514.8 square miles), and is located approximately 85% in Pinal County and about 8% in Gila County, 5% in Pima County and 3% in Graham County. 56% percent of the land is State of Arizona owned, 18% is privately owned, 17% is managed by the Bureau of Land Management, 8% is National Forest and 1% is other land ownership including Tribal Lands (NRCS ArcGIS information).

There are approximately 1,160 acres of irrigated cropland in the watershed comprised of 10 farms; 2 farms produce food/fiber crops, 7 farms are irrigated pasture for livestock and one farm is orchard. Important crops include native grass, alfalfa, wheat, cotton and citrus. The total grazing area is approximately 1,379,147 acres with 62 ranches. Land acreage for this estimate includes Federal, State and private lands. Urban land is currently 40,663 (2.5% of the district) and increasing annually with growth mainly near Oracle, Oro Valley, Catalina and Florence. Therefore, the land use is dominated by livestock operations of which most fall into two categories; ephemeral steer operations at the lower elevations and cow calf operations at the higher elevations.

Major towns and cities include Florence, Oracle and major communities in the District are Dudleyville, Hayden, Kearny, Kelvin, Mammoth, Catalina, Oracle, San Manuel, and Winkelman.

Mission/Vision Statement

"The Winkelman Natural Resource Conservation District will strive to insure a sustainable natural resource base for future generations by promoting a voluntary culture of conservation" according to the following principles:

1. Protecting private property rights
2. Fostering a sustainable and resilient economy
3. Promoting incentive based habitat conservation and species diversity

Mission Objectives

Avoid future ESA listings thru promotion of Best Management Practices.

Prevent major thru infrastructure development that has a significant and negative affect on the natural resource base of the district and do not serve the community,

Work toward mutual trust and understanding among our cooperators and stakeholders

Maintain unfragmented landscapes by promoting:

- a. Intact habitat corridors
- b. Agriculture as a conservation use
- c. Local culture
- d. A land ethic
- e. Appropriate recreation

Maintain or improve water resources

Maintain a vigorous profitable agriculture base to keep the district rural and sustainable

Encourage land uses that have positive effects on the natural resource base of the district as a whole

Promote the sustainability of district schools and towns by protecting the local tax base and promoting the local economies and long term grazing leases to provide for the fourteen beneficiaries of the State Land Trust

1. Discuss Districts' Mission statement in detail.

The mission/vision statement of the district is a living document that is constantly being updated to reflect the changes, values and challenges of a district that contains about 12 percent private lands; the rest being federal and state lands. The statement was updated last as a result of the U.S. Fish and Wildlife Service's (FWS) attempt to create a refuge in the lower San Pedro Valley (SPV). This would have had a devastating effect on the local tax base, resulting in further weakening of our local towns and school districts. We have spent the last several years working to create a locally driven alternative that will assure the FWS from coming back with another refuge proposal.

We spent about a year and a half working on the vision document. It was then incorporated into the district Long Range Plan. The LSP being the home of numerous endangered species and species of concern is a focal point for mitigation investments for large companies in Arizona. We felt these investments and species needed to be protected on a local basis. Also, the SPV has a robust agricultural economy that would be hurt, perhaps mortally if a refuge is introduced here. Not only that but the valley is about 20 percent state lands. With the advent of a refuge, those state lands will be forever locked into a reduced "Highest and Best Value" of agriculture.

The FWS is watching for developments in the Valley closely that will, in their view, threaten the SPV. The several parts of the vision statement address the various legislative mandates the districts are to protect, plus our local vision for the district; i.e. natural resources addressed through our statements about intact habitat corridors; our statement about protecting private property rights addressing our mandate to protect the local tax base.

2. Structure of the District and representation of its constituents.

The district is overwhelmingly rural. There are four small towns and four school districts within the district boundaries. Although the land base is dominated by agriculture, the economic base is dominated by copper mining and smelting. Because of the district's mandates, our constituency is overwhelmingly cattle and agricultural producers.

3. Responsibilities of the District to its constituents and cooperators.

To protect the natural resources. We do that by bringing state and federal dollars to those resources through the state Land Department, state Department of Agriculture, the USDA, BLM and Forest Service and private dollars. The district is also an intermediary between producers and agencies whenever conflicts arise.

4. Your role as a Supervisor.

- To represent our constituency and the natural resources.
- To incorporate science and best available science to all our actions.
- To follow Arizona's Open Meeting laws.
- To be accountable to the Legislature.

5. Examples of the type of meetings, actions and activities by the Districts.

The District conducts regularly scheduled quarterly meetings to bring the constituents up to date on district activities. Special meetings are held as needed for interested constituents, such as the Kearny River Fire. We hold coordination meetings with agencies per their NEPA requirements to make sure their actions are consistent with our plans and policies. Often, one or more of our supervisors will meet with agencies on behalf of constituents.

WINKELMAN NATURAL RESOURCE CONSERVATION DISTRICT

2015-2020



LAND AND RESOURCE MANAGEMENT PLAN

Approved June 6, 2015

Supervisors

**Bill Dunn
Francie Meyer
Steve Turcotte
Gary Vinson
Carol DuBois**

Statement of Vision

"The Winkelman Natural Resource Conservation District will strive to insure a sustainable natural resource base for future generations by promoting a voluntary culture of conservation" according to the following principles:

1. Protecting private property rights
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3. Promoting incentive based habitat conservation and species diversity

Vision Objectives

Avoid future ESA listings thru promotion of Best Management Practices.

Prevent major thru infrastructure development that has a significant and negative affect on the natural resource base of the district and do not serve the community,

Work toward mutual trust and understanding among our cooperators and stakeholders

Maintain unfragmented landscapes by promoting:

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Maintain or improve water resources

Maintain a vigorous profitable agriculture base to keep the district rural and sustainable

Encourage land uses that have positive effects on the natural resource base of the district as a whole

Promote the sustainability of district schools and towns by protecting the local tax base and promoting the local economies and long term grazing leases to provide for the fourteen beneficiaries of the State Land Trust

This Plan includes by reference the *Winkelman NRCD Field Report* as a comprehensive study of the District, its history, characteristics, and resources both natural and man-made. The Field Report can be accessed at www.wnrcd.org. More about the Field Report below.

Winkelman NRCD Land and Resource Management Plan

Goals and Functions

The stated goal of the Winkelman NRCD is “to support and encourage the proper and wise sustained use and management of our basic renewable and non-renewable natural resources utilizing sound science and valid on-ground experience.” The District attempts to provide leadership in order to promote good management of the natural resources of the district through coordination conservation and development programs resulting in the wise use of lands within the district.

The Winkelman Natural Resource Conservation District will work with and provide guidance to rural property owners, farmers and ranchers for the protection, restoration and conservation of land, water and soil resources of the District and state to include the preservation of water rights and the control and prevention of soil erosion.

The District will assist private property owners in conserving natural resources, fish and wildlife and their habitat, rivers and streams and associated riparian habitats, protecting the tax base, protecting public lands, and assisting private property owners to make viable and responsible use of their private lands.

The District will utilize available resources to monitor fish, wildlife and plant species within the district, and recommend appropriate action to assist cooperators and agencies for their protection. We will consider the health of habitats or watersheds as a whole, understanding the interrelationships that individual actions have on the whole. Our goal will be to maintain or improve those larger systems and not manage for individual species within those systems unless it benefits the whole.

The major function of the district is to keep active management on the land, through education, technical assistance, agency interaction and other actions on behalf of our cooperators.

Since water and the accompanying water rights recognized by the State of Arizona are so important to the continued viability of all human activities within the district, we affirm the District's support of the long held doctrines of “prior appropriation” and “beneficial use” to support privately held water rights.

District Supervisors have identified major obstacles to the district's ability to carry out the stated functions and goals of this plan.

They include:

- Major utility corridors being planned through the District.
- Aspects of the *Trails and Parks Plan* of Pinal County Comprehensive Plan that

has the potential to open up certain areas of the District for activities which are inconsistent with District goals.

- Conversion of private land to federal and state agency owned land through purchase and mitigation, which diminishes the tax base, production capability and sometimes diminishes the conservation management of the property within the district.
- Increases of woody native plants species.
- Unwarranted listing attempts of species under the endangered species act.
- Invasion of non-native and undesirable native species within the district.

The district has addressed these threats with policies. They include:

Policy 1

Major Corridors Policy

It is the policy of the Winkelman Natural Resource Conservation District to oppose the construction of any new major energy, transportation or communication corridors through or across District lands. Furthermore, in order to minimize impacts to District lands and resources, all future major new transmission installations should be planned to follow existing rights-of-way. In addition, the District strongly encourages that, whenever possible, considerations be made for upgrading existing facilities rather than construction of new facilities.

In accordance with its Long Range Plan, it is the goal and responsibility of the Winkelman Natural Resource Conservation District to "address socio-economic, rural and urban development issues", to "foster the appreciation of cultural and wildlife resources" and to "protect the tax base and individual property rights" within the District.

Private lands provide the tax base that supports most of the county services and they are the underlying commensurate lands for federal grazing leases. It is the policy of the Winkelman District that there should be no net loss of private land within the District; however, any impacts to private property resulting from such projects must be justly compensated.

It is the policy of the Winkelman District to protect the local customs and culture. District lands encompass areas with treasured historic and cultural significance, lands with essential mineral resources as well as long standing farms and ranches that support the local tax base and help protect open space.

District boundaries encompass areas considered to be mitigation lands for protected, threatened and endangered species, lands with Wilderness designation, and lands with essential mineral resources. Development of any new major development corridors would negate these already established mitigation lands.

Policy 2**Private Land**

It is the policy of the Winkelman District that there should be no net loss of private land within the District.

There is very little private land in the Winkelman District. Because of the way the District was settled, like most of the west, private lands in the District are generally the most productive and valuable lands. Private lands provide the tax base that supports most of the county services and they are the underlying commensurate lands for federal grazing leases.

The San Pedro and Gila Rivers are prime mitigation areas. Mitigation depletes the available private land in the District and weakens the tax base as well as the productive resource of the District. It is the policy of the Winkelman District to oppose any new transfers of private land for mitigation purposes.

Policy 3**Reintroductions**

Whereas: The Winkelman Natural Resource Conservation District has been occupied by humans for the past 1500 years and because of that, the ecology of the district is different than it was before occupation by humans, as it is with all new species,

And whereas, the earth is constantly evolving and plants, animals, and ecosystems are evolving in response to that change; habitats become more or less suitable for each species;

And whereas, humans and their cultural practices are an integral part of the ecosystem and it is critical to environmental concerns that both the human environmental needs and the natural environmental needs be met, as recognized by the United States Congress in the National Environmental Policy Act and implementing regulations issued by each department and by the Council on Environmental Quality;

And whereas, It is environmentally necessary, as recognized by Congress in the National Environmental Policy Act, that there be harmony between the human environment and the natural environment;

And whereas, Artificial introduction or reintroduction of a species by man through government action will be contrary to the natural development and evolution of the ecosystems within the District, will create disharmony between the human environment and natural environment as they currently exist in natural co-existence, and will be contrary to the intent and mandates of Congress in the National Environmental Policy Act and the implementing regulations issued by executive departments of government;

And whereas, species introduced to the district by, or as a result of, governmental actions or agencies can upset the ecology and the unique ecosystems that are here, to wit the salt cedar;

Therefore it is resolved by the Winkelman Natural Resource Conservation District that the policy of the District is to oppose artificial introductions or reintroductions of species that have not, or are not, doing so on their own.

Policy 3(b)

Experimental Population Expansion of the Mexican Wolf

Pursuant to the Introductions and Reintroductions Policy of the Winkelman NRCD Land and Management Plan, the following policy is amended into the plan as "Policy 3(b)" to be titled "Experimental Population Expansion of the Mexican Wolf" The Policy is stated as follows:

The Stakeholder's Alternative for the management of the experimental population of the Mexican Wolf Population under the Endangered Species Act, 10j rule, is adopted, in its entirety, as the management policy of the Winkelman NRCD.

This alternative is appropriate for the management of this species within the Winkelman District for the following reasons:

- It is based on sound scientific principles, studies and data that have met the highest peer review standards including those set forth by the National Academy of Sciences.
- It takes into account the core responsibilities of the Conservation Districts to protect all of the natural resources within our boundaries by not artificially favoring one species over another.
- It conforms to our Reintroductions Policy, our Customs and Culture Policy, our Livestock Grazing policy and our policy Recognizing the Expertise of Arizona Game and Fish Department.
- It fulfills and complies with all federal and state laws governing the management of endangered species including the Endangered Species Act.
- It fulfills the requirements of the National Environmental Policy Act in that it best balances the human and natural environment by preserving both the species and economy of those directly affected.
- It protects the health, safety and welfare of landowners, producers, residents and tourists from unreasonable loss of life and livestock due to wolf presence.
- It was developed with broad public engagement and has the support of many local governments, tribal governments, conservation groups, livestock producers

and sportsmen conservationists.

Without the protections for our producers that are in the Stakeholder's Alternative the District will be unable to accomplish those important directives in our Vision Statement at the beginning of our Land and Management Plan.

We will be unable to "maintain a vigorous profitable agricultural base to keep the District rural and sustainable." If our producers are unable to be profitable and sustainable they will necessarily become developers of their private lands in order to protect their investments. This will, among other things, threaten the "last free flowing river in Arizona", the San Pedro and one of Arizona's crown jewels, the Aravaipa.

We will be unable to "Encourage land uses that have positive effects on the natural resource base of the district as a whole."

We will be unable to protect "long term grazing leases to provide for the fourteen beneficiaries of the State Land Trust."

Policy 4

Customs and Culture

It is the policy of the Winkelman District to protect the local customs and culture. District lands encompass areas with treasured historic and cultural significance, lands with essential mineral resources as well as long standing farms and ranches that support the local tax base and help protect open space.

In accordance with its Long Range Plan, it is the goal and responsibility of the Winkelman Natural Resource Conservation District to "address socio-economic, rural and urban development issues", to "foster the appreciation of cultural and wildlife resources" and to "protect the tax base and individual property rights" within the District. District lands encompass areas with treasured historic and cultural significance, areas for protection and mitigation for protected, threatened and endangered species, lands with Wilderness designation, lands with essential mineral resources as well as long-standing farms and ranches that support the tax base and help to protect open space. Any new major utility construction, such as the proposed Sunzia project, would adversely affect those important district resources by promoting further land fragmentation, the possible destruction of valued cultural and historic resources, disturbance of soil and degradation of water quality as well as affect the ability of landowners to steward their properties and produce essential products for the benefit of the people of the District, the county, the State of Arizona and the United States.

**Policy 5
Ecotones**

Ecotones are the zones of transitions, or junction zones, between two different ecosystems, such as where the land meets the sea. Ecosystems are the community of organisms, along with their environments, that form an interactive system within an identifiable space. Ecotones are essential to the richness and robustness of our environment. Construction of large infrastructure such as power transmission lines, clean energy facilities, gas lines, freeways and related infrastructure projects require the clearing of the landscape and may destroy, regressively alter, and/ or restrict the robustness of an ecosystem that may result in undesirable monocultures. Mitigation is the standard method for agencies to, in effect, trade off the harm that is often done to ecotones and ecosystems when harmful activities associated with major infrastructure such as land clearing are permitted. However, ecosystem and ecotone destruction cannot be mitigated. It is impossible to completely mitigate distinct ecosystems, because each ecosystem is unique and has developed over long periods of time under distinct environmental influences. Ecotone destruction is a final state just as the presence of large infrastructure is also in perpetuity.

Intact ecosystems and ecotones are of the highest value to the District and its people. Therefore, the District opposes any infrastructure and the activities associated with them that would destroy ecotones and/or ecosystems.

**POLICY 6
Winkelman Policy Recognizing the Expertise of Arizona Game and Fish
Department**

Since the formation of the Winkelman NRCD, the District has worked closely with Arizona Game and Fish Department on issues and conflicts relating to both game and non-game species. In this relationship the District has acknowledged the expertise of the AGFD as the managers in Arizona of both classes of animals. We have also noted the deference given to the AGFD by the federal agencies for the same expertise.

The AGFD has acknowledged and consulted the District for its local expertise in other natural resource issues within the District and as such we have developed a complementary and respectful relationship where those issues coincide.

Arizona statute defines wildlife, both resident and migratory, native or introduced to be property of the AGFD (ARS 17-102)and provides for the AGFD to cooperate with the Arizona-Mexico Commission and with researchers at universities in this state to collect data and conduct projects in the United States and Mexico on issues that are within the scope of the department's duties and that relate to the quality of life, trade and economic development (ARS 17-231,A,9).

The AGFD is empowered to investigate property damage from wildlife and is empowered to relieve that damage through special permits if necessary (ARS 17-239 A,B,C,D) and persons may seek judicial review for damages by wildlife under Arizona law (ARS 17-239 E).

Arizona law identifies the AGFD as the agency to investigate, document, quarantine and destroy wildlife in order to prevent the spread of infectious, contagious or communicable diseases in wildlife that may pose a health threat to animals or humans (ARS 17-250 A 1,2,3).

Therefore, it is the policy of the Winkelman District to recognize the Arizona Game and Fish Department as the best agency in Arizona to manage its wildlife including threatened and endangered species.

Policy 7 Major Developments

It is the policy of the District to oppose any further industrial scale major development that would contribute additional or cumulative impacts to the health and well-being of the people and resources located on lands within the District

Policy 8 Endangered Species Policy

The Winkelman Natural Resource Conservation District (the District) recognizes the value of ensuring the survival of species that have "esthetic, ecological, educational, historical, recreational, and scientific value to the Nation and its people" as stated in the Endangered Species Act (the Act). The District supports the original principle of the Endangered Species Act.

The primary duty of the District is to assist its landowners to protect and improve the resources within their control thereby ensuring sustainability and production efficiency and thus conserving the habitats and species that live on their lands. Because of their often multi-generational experience, those landowners are the local experts in conserving those natural resources. The District is a political subdivision of State government whose members are those local experts.

However, the Act has not recognized the value of that local expertise and the U.S. Fish and Wildlife Service (the Service) has not adequately utilized that knowledge when making determinations and decisions regarding threatened and endangered species. The consequences of this failure has led to a lack of confidence by landowners who are often the prime stewards of the habitats of these species. The success of our efforts as a nation to protect and prevent extinction of species relies on the voluntary support of our people and the confidence we have in the Act

and its implementation.

Since the passing of the Act in 1973, only one percent of "listed" species has "recovered". This is an appalling track record that can be partially attributed to inadequate agency planning and implementation and the Service's failure to utilize local coordination from the beginning of the "listing" process.

Therefore, to assist the Service in improving the efficacy and success of the Endangered Species Act, it is the policy of the District to direct the Service to act according to the following guideline:

- The Service will notify the District immediately upon receiving a petition to list a species within the District.
- Whenever a species that affects the District is listed, the Service will engage in meaningful coordination with the District according to the Service's mandated legal NEPA obligations.

Policies alone do nothing to diminish threats within the district, but are guides when pursuing goals. These goals are pursued on several fronts.

Coordination

The District will Coordinate with federal and state agencies by:

1. Early involvement with agencies as they begin moving forward on issues pertaining to natural resources including fish and wildlife.
2. Ensuring that our plans are incorporated and addressed for consistency in any Environmental Impact Statement affecting the District.
3. Ensuring that all property owners are aware of proposed actions.
4. Convening public meetings on an issue when necessary.
5. Utilizing experts from the universities, the Natural Resources Conservation Service, Federal and State land agencies and private consultants to provide information on issues.
6. Insisting on agency compliance with National Environmental Policy Act, the Data Quality Act, and the Administrative Procedures Act.
7. Ensuring all actions pertaining to species are beneficial for all species and do not preclude the ability of humans to manage and enjoy our natural resources.

8. Ensuring all actions will protect the economic base of the district.

***The District has several ongoing projects which support this plan.
They include:***

District Field Report

In 2012 the District Field Report was updated by Katie Cline. This report is a comprehensive study of the farms, ranches, mines, towns, and all other relevant resources within the District. It is an invaluable reference for all future actions by the District. The Field Report identifies resource concerns in the District and directs means to address them. Those resources can include EQIP funds, funds allocated through the Winkelman Resource Management Center, and technical service providers (TSP's) in order to aid in major projects, monitor resources and educate and train producers, cooperators and others.

In order for District supervisors, cooperators, county, towns, and agencies to understand what lands and resources are in the District. The District Field Report will be updated as needed. This aids in major projects by the District.

Sonoran Desert Tortoise

Meyer Tortoise Study

The district will facilitate, with manpower and funding if necessary, the ongoing SDT study, being conducted by Dr. Walt Meyer within the District. This study is essential as a knowledge base for the scientific community on the tortoise and those plants and animals that interact with it. It is also the basis for the District's *Sonoran Desert Tortoise Conservation Plan*.

Best Management Practices

The District has initiated consultation with US Fish and Wildlife Service, Arizona Game and Fish Department, Bureau of Land Management, Natural Resource Conservation Service to create a 4D Rule for grazing for the tortoise in the case that the SDT is listed as endangered. This rule will enable the grazing industry, by identifying Best Management Practices to avoid being unduly impacted by any future listing of the tortoise.

The District joined with the Bureau of Land Management, U.S. Fish and Wildlife Service, Arizona Association of Natural Resource Conservation Districts, and Arizona Game and Fish Department and Natural Resources Conservation Service to form the Sonoran Desert Tortoise Working Group to create a Best Management Practices document for grazing in SDT habitat has been reviewed by the livestock industry, other NRCDs as well as foes of the industry, to be used by the grazing industry for the protection of the SDT. This document is designed to be a template for other species

and industries that are or expect to be affected by the Endangered Species Act.

Surveys and Studies

The District plans to initiate a district-wide population survey for SDT using habitat identification characteristics. This will enable all Districts within the SDT habitat to conduct population surveys in order to determine with confidence the total population of SDTs before the 2015 FWS listing determination as agreed to by Fish and Wildlife Service in lawsuit.

The District is also contracting with University of Arizona personnel to do population modeling for SDT using data from the Meyer Study.

Sonoran Desert Tortoise Conservation Plan

The WNRCD Sonoran Desert Tortoise Conservation Plan was conceived in 2010 as a result of listing attempts on the SDT. It spells out Best Management Practices for the conservation of the Sonoran Desert tortoise for towns, industry, etc. Originally, it was the intent that the plan would be adopted by Pinal County and the various towns and industries in the District as an aid in preventing the need to list the tortoise. It is now being reduced in scope to protect basic industries in the district in preventing undue controls by federal and state agencies. This project is being accomplished in cooperation with the U.S. Fish and Wildlife Service, Arizona Game and Fish Department, Arizona Association of NRCDs and Natural Resources Conservation Service. The District will maintain and revise this plan as necessary.

Expansion of Non-Essential Experimental Population of Mexican Wolf under the 10J Rule

In 2014 the District board decided to demand coordination, along with other districts and local governments in Arizona and New Mexico on the expansion of the 10J rule for the non-essential population of the Mexican wolf by the U.S. Fish and Wildlife Service.

Illegal Dumping

Illegal dumping has been a problem for the District for many years. The District formed a committee as a result of District cooperator's threat of loss of grazing permits due to illegal dumping, the District created the Wildcat dumping taskforce in 2004 the Taskforce included many interested agencies and organizations that addressed the problem. As a result, the taskforce published and funded a booklet, All Things Garbage, to serve as a free reference guide for citizens throughout the county.

The District has also created legislation to help law enforcement officials combat illegal dumping. Legislation was passed in 2012 and is now state law.

Conservation Resource Management Plans

The District is working with cooperators, landowners, land management agencies and the Natural Resource Conservation Services to implement conservation management plans on ranches within the District. The goal is to implement them on 100% of the lands within the District.

Conservation Resource Management plans require monitoring on ranches to determine if cooperators are reaching their production goals on native ranges, to detect trends in range health, and to aid in the management of those ranges. The District is continually seeking funding for range monitoring, as it is always in short supply.

Lower San Pedro Natural Resource Conservation Districts Initiative

The Lower San Pedro River Valley has long been considered of special significance by conservationists and others because of the numbers of threatened and endangered species that inhabit it or use it as a migration corridor. Consequently, many of the private lands there have been converted from agricultural production to endangered species mitigation lands. This is beginning to alter the historical agricultural uses of the Valley. In 2012 a proposal by the USFWS to create a refuge in the Valley spurred the District to join with the Redington District to create a unique model for retaining those private lands, thus protecting and enhancing the viability of agriculture as an essential conservation use, while preserving the natural resource base for species and their habitat.. In June 2015, the two Districts prepared a Regional Conservation Partnership Program Grant application along with several partners to address the main resource concerns in the Valley.

Economic Survey

The District is commissioning an economic analysis of the District and will update it, as necessary, to aid in its other ongoing endeavors.

Local Work Group

The Natural Resources Conservation Service in 2013 changed their policy for determining how they would allocate funding for EQIP projects. Instead of prioritizing funds based on national priorities they would ask the individual districts to identify the resource priorities locally and the districts would identify those EQIP practices that would address those concerns. The NRCS will rank projects within the district accordingly for funding. To that end the WNRCD will now use the Local Work Group to annually identify and update those priorities.

Tamarisk

Since its introduction to Arizona, the tamarisk (*Salt Cedar*) has invaded most of the Gila and San Pedro River basins as well as many of their tributaries and other riparian areas within the District. In recent years, the tamarisk beetle, a biological control agent for tamarisk, has been introduced into the southwest. It is inevitable that the beetle will have an impact on the tamarisk populations within the district. The Winkelman District must begin to plan for that change as it will be both a problem and an opportunity for our producers. This will be a major focus for the District in the coming years. The ecological impact of the beetle will create an extreme impact on the habit.

DISTRICT GUIDING PRINCIPLES

The objectives set forth are to provide guidance measures to be implemented through this plan and and direction provided through the District's approved policies and procedures in the attainment of District goals.

Promote the protection of private property rights including water rights

a. The District will oppose any transfer of water by artificial means to or from areas outside the District until such time as the scientific and economic data which meets the requirement of the Data Quality Act (Public Law 106-554, 2001) supports such action. Data must also support that there will be absolutely no resource or economic harm now or in the future to the urban and rural property owners within the District.

b. The District opposes any requirement for water meters on private wells.

Embrace the multiple use philosophy of the Federal Land and Management Act of 1976.

Agriculture, mining, recreation, hunting, hiking, and camping are all a part of the multiple use of public lands. The District supports all these multiple uses along with the requirement for the conservation of natural resources and the economic wellbeing of the people and the local governments. All documents published by government agencies for management and use of public land must be based on the most current and best available science and in compliance with all Agency regulations, the Federal Land and Management Act of 1976, National Environmental Policy Act (NEPA) and the Data Quality Act.

Establish protocols for monitoring and studies

a. The District requests for all federal and state agencies with management responsibilities in the District for species and/or its habitat provide the District with an annual update of the monitoring programs they have in place, data collected and

specifics about their collection protocols. The district also requests that these agencies inform the District of proposed research projects and allow for the District's input and collaboration prior to implementation.

b. The District supports regular monitoring, within the scope of published protocols, of the resources within the District is essential to ensuring the policies and best management practices are updated and implemented.

c. All data shall be collected and studies prepared using protocols that will ensure the quality, utility, objectivity and integrity of the information as required under the Data Quality Act.

d. All data that is gathered must be shared with the District in a timely manner regardless of the state of completion of a final report.

e. Private landowners are also encouraged to monitor and at their discretion share data collected on private property within the District.

f. All data that is shared with the District that is not public information will be treated as confidential and used by the District by permission only to help update and implement its policies and best management practices.

Coordination with the federal and state agencies

- a. Enter into coordination with the federal and state agencies and the counties in the management of lands and/or resources located within the District to insure agency plans are either consistent with the District plans or contain an explanation for the non-consistency areas.
- b. Provide information to and consult with the Governor on inconsistencies between the District plans and final NEPA documents.

Livestock Grazing

The District has a long history of livestock grazing both on private and public lands. When properly managed, livestock are an important tool for resource management, helping improve habitat and decrease fire hazards. Livestock grazing should continue to be managed to benefit human health, historic culture and economic well-being by observing the following.

- a. Maintain sustainable grazing consistent with historic land use and ranching practices.
- b. Livestock grazing is an important tool to properly manage habitat and should be used in resource management.

- c. Any grazing restrictions or conservation measures that are implemented through a grazing permit shall be based solely on the conditions and science, specific to that permitted grazing allotment.
- d. Annual precipitation measurements should become a part of annual operating plans. If the monitoring data shows there is an increase in forage that supports additional livestock in a suitable habitat area, then increased grazing should be considered.
- e. Normal grazing permit renewals should not be considered a major action by federal agencies but until they stop doing so they should prioritize completion of land (range) health assessments and grazing permit NEPA analysis on allotments.
- f. Allotment management changes must be tailored to address specific problems. The best available science should be used to address problems and diverse solutions, such as the flexibility to change livestock numbers or timing and season of use, should be considered.
- g. Changes in grazing management initiated by agencies should only occur when supported by appropriate monitoring data in conjunction with the property owner, permittee, NRCS, District and government agency.
- h. Management changes, when needed, must be tailored to specifically address habitat objectives that need improvement, but should not adversely affect the habitat of other species.
- i. Altering grazing schemes in allotments, where needed and appropriate, may be facilitated by enhanced grazing opportunities with brush removal and grass seeding when needed. The unintended consequences of altering grazing use, such as possible increased risk of wildfire, must be carefully considered in any management proposal
- j. Waters used for rural domestic, livestock, and wildlife and uses which are essential to the continued use and conservation of natural resources for the benefit of all residents of the District should be classified as beneficial.

Mineral Development

- a. Mining has always been an important part of the District's history and should continue. Mineral access, claim access and future mineral development can all be pursued, as has been done historically following best management practices and with the advancement of technology that continues to reduce short-term and long-term impacts.
- b. Full access to all resources must be maintained in order to ensure a productive economy and the health, safety and welfare of the citizens of the District.

Support Resource Restoration after Fire

- a. In the event of a wildfire, coordinate with appropriate agencies in developing and implementing rehabilitation plans.
- b. When pursuing habitat restoration or rehabilitation, use native plant species produced within the District when available.
- c. Coordinate with appropriate agencies for support for controlled burns by cooperators.

Provide and support resource improvement and management on small parcels of land.

- a. Promote, support and assist owners of small parcels of land with making improvements to their land and addressing their resource concerns. Utilize workshops and property visits by NRCD and/or NRCS personnel to accomplish this objective.
- b. Provide information on type and source of seed for reestablishment of native grasses.
- c. Instruct and provide information on erosion control projects which can be accomplished on small plots of land. Workshops can be used for this purpose.
- d. Provide information on proper livestock and manure management.
- e. Provide guidance on correct wildlife conservation practices.

Natural Resource Education

- a. Promote, develop and maintain natural resource education projects to benefit the resources and the people.
- b. Utilize the District website www.wnrcd.org to provide educational information including educational material, workshop announcements, and videos.
- c. Support the development of District operation and training videos.
- d. Support the development of District operation and training videos and post the completed videos on the District website.

- e. Publish a quarterly newsletter to keep Cooperators and others informed of District activities.
- f. Provide workshops for District cooperators, students and the public.
- g. Provide natural resource workshops for grade school students at schools within the District
- h. Provide support to the Natural Resource Conservation Workshop for Arizona Youth.
- i. Produce and acquire programs which provide education about resource management and make them available to schools in the District using the workshops, the web site, and the newsletter.
- j. Invite knowledgeable speakers to the District.
- k. Encourage the District Supervisors to attend workshops and seminars to improve their knowledge of resource management and to develop better leadership skills.
- l. Promote and encourage training sessions for agency personnel.
- m. Encourage state and national leaders and the press to tour the District and learn more about the resource management efforts and concerns.
- n. Hold workshops with other organizations to improve communication and understanding.
- o. Encourage Universities to utilize the District resource for field training.
- p. Provide recognition for outstanding and innovative conservation programs or service within the District.

Winkelman Resource Management Center

The District has funded and staffed an Education Center. The Winkelman Resource Management Center is reestablishing its IRS 501C3 classification, which enables it to receive tax deductible donations.

The stated goals of the Resource Management Center are:

- Develop and implement quality educational programs that promote conservation and responsible natural resource management and target critical issues approved by the advisory board.
- Present balanced educational programs at schools and public events.

- Work with local colleges and cooperative extension programs to enhance community awareness and expand programs.
- Interact with other NRCD and NRCS staff to assure efficient use of resources and opportunities for partnering.
- Publish documents, pamphlets, and scientific studies.
- Support the local school districts by hiring a science teacher to be shared by the District schools.
- Maintain the district website. The website is the district's official meeting notification point as provided by Arizona's Open Meeting Law requirements. It also contains all documents, agendas, meeting announcements and current activities of the district.
- Utilize social media and technology for outreach

The Center may be the vehicle for managing the Lower San Pedro Planning Area effort.

Educational projects to support the District Plan are:

- Cooperator education on the WNRCD SDT Conservation Plan and BMP's for ranching activities thru the 4D rule on the Sonoran Desert Tortoise.
- Range monitoring workshops in cooperation with University students and cooperators
- The identification and control of noxious weeds

**BEST MANAGEMENT PRACTICES FOR RANCHING IN SONORAN DESERT TORTOISE
(*Gopherus morafkai*) HABITAT IN ARIZONA
EXECUTIVE SUMMARY**

On December 13, 2010, the U.S. Fish and Wildlife Service, (FWS) issued a positive 12-Month Finding in the Federal Register that Sonoran desert tortoise (*Gopherus morafkai*) (SDT) warrants protection under the Endangered Species Act (ESA) but was precluded by the need to address other higher listing priorities. As a result, the SDT is a candidate for ESA protection where its status is reviewed annually. Livestock grazing in Arizona is actively managed, and FWS found that, while grazing effects to SDT may occur, potential effects of livestock grazing are limited in severity and scope. Although grazing was not listed as a threat in Arizona, the Ranching and Sonoran Desert Tortoise Working Group (Working Group) formed in 2011 to conserve existing SDT populations, provide conservation measures to offset potential effects, and possibly preclude the need to list the species under the ESA in the future. The Working Group is composed of ranchers and resource specialists from a variety of land and resource management agencies, and is a collaborative effort that fosters cooperation and exchange of information, and identifies appropriate voluntary conservation measures that would reduce or eliminate consultation for ranching activities if the species were listed. This effort also serves to be a continuous, iterative, proactive and voluntary approach by the ranching industry in working with agencies to conserve SDT and its habitat.

Finalized on March 9, 2015, this document facilitates the implementation of conservation measures for SDT on livestock ranches in Arizona providing the mutual assurance that working rangelands can support the longterm survival of the species. It does not replace existing conservation and management plans designed for SDT or their habitat. This document does not supersede land management agency authorities, regulations and policies. Rather, its intent is to enhance the effectiveness of those activities within livestock ranches, and may serve as a template for identifying and implementing conservation measures for other species also occurring on rangelands. The full version of this document and other related documents are below:

Best Management Practices (BMP), 03/09/2015	<u>BMP Final Document</u>
SDT Conservation Plan	<u>winkelman-nrcd-conservation-plan-for-sonoran-desert-tortoise</u>
SDT Annual Survey	<u>2015 Sonoran Desert Tortoise BMP SurveyPDF</u>
SDT Population Map	<u>sonoran desert tortoise map 2012 usfws</u>
SDT Resolution	<u>Resolution for The Sonoran Desert Tortoise BMP Draft 2015.4.10</u>

Projects & Activities Ongoing

Sonoran Desert Tortoise. Confronting the FWS with science in their decision on whether or not to list the Sonoran Desert tortoise (SDT) as endangered. The district spent over ten years and thousands of man hours in that project including coordination and development of best management practices for grazing in SDT habitat. The FWS just announced their decision to not list the SDT as endangered.

Mexican Wolf. FWS' plan to expand the 10J Rule for the Mexican Wolf. The district joined with 5 other districts in coordination with them to stop the expansion. Although the effort was unsuccessful, we confronted them with data that will be used in a lawsuit to stop the expansion.

Illegal Dumping. Illegal dumping is a ubiquitous problem in the district owing to its closeness to Arizona's major population areas. We authored and lobbied for a statute that strengthens law enforcement's ability to be effective in this area.

Conservation Resource Management Plans (CRM) are a planning tool that enables producers and agencies to identify and address, in a logical way, natural resource concerns of a management unit. The district's goal is to have 100% of our producers complete a CRM on their ranch or farm with a consistent monitoring protocol. This will give the agencies and them data to resist radical environmental organizations from removing those producers from the land.

Lower San Pedro Initiative. A joint project with the Redington District, attempts to bring outside funds to our producers to make them more efficient in their use of rangelands and irrigation in order to keep them sustainable and able to withstand short term production challenges and stay on the land. This will keep the San Pedro Valley open and rural.

Tonto National Forest Long Range Plan. The district is in the beginning stages of coordination with the Tonto National Forest to make sure their planning takes into account district plans and policies and makes their LRP consistent with them.

WNRCD Planned projects

Kearny River Fire. This summer the Kearny River Fire burned about 1500 acres of river forest. The district is coordinating rehabilitation for this fire. The two main concerns are: creating a defensible fire space around Kearny and restoring the habitat (Salt Cedar removal, planting grasses/trees (Willows, Cottonwoods)) for the native wildlife.



Picture next to the Gila river near the Kearny corrals

Lower San Pedro Initiative: A Redington and Winkelman NRCD joint project.

The initiative has evolved through several iterations to become the Lower San Pedro River Initiative (LSPI). The vision of the LSPI is to ensure a sustainable natural resource base for future generations by promoting a "voluntary culture of conservation" by protecting private property rights, fostering a sustainable and resilient economy; and promoting incentive based habitat conservation and species diversity.

Completed projects

Finalize the Best Management Practices for the Sonoran Desert Tortoise document

To promote a voluntary approach to protection of the Sonoran Desert Tortoise, a group of Arizona Conservation Districts launched a partnership effort in February 2011 with US Fish and Wildlife Service, Arizona Game and Fish Department, the USDA Natural Resources Conservation Service, the USDI Bureau of Land Management and the Arizona Association of Conservation Districts. They spent over 3 years evaluating ranching activities, and the conservation practices that ranchers and agencies use to implement sound rangeland management in the Sonoran Desert. Ranchers, farmers and landowners will be asked to voluntarily add these Best Management Practices to their conservation plans, and coordinated resource management plans. Voluntary adoption of BMPs by ranchers and other land users will provide protection for the tortoise on all of the private, state, tribal and federal lands under their management.

https://wnrcd.files.wordpress.com/2014/09/final_bmpforsdt_20150309.pdf

Passed legislation for illegal dumping law changes. In 2008, a guide was prepared by the Winkelman Natural Resource Conservation District Wildcat Dumping Task Force. "A Guide to all Things Garbage": With growth comes garbage. Wildcat dumping, which is defined as any illegal dumping, is a blight on our communities and natural resources. It is dangerous to our wildlife and livestock who can die from eating discarded poisonous plant clippings or plastic bags. Old tires, paint, insecticides, antifreeze and appliances can pollute our soil, water and air. <https://wnrcd.files.wordpress.com/2014/01/allthingsgarbage-3rd.pdf>

Submitted an RCPP grant proposal in coordination with the Redington District.

In conjunction with the RNRCD & WNRCD's Lower San Pedro Initiative (LSPI), a grant proposal was submitted but unfortunately denied. Learning from our mistakes, the plan is to revise the proposal and submit again next year. The grant monies would be used to support our LSPI. See Vision statement: The Lower San Pedro River Management Area will strive to ensure a sustainable natural resource base for future generations by promoting a voluntary culture of conservation" according to the following principles:

1. Protecting private property rights
2. Fostering a sustainable and resilient economy
3. Promoting incentive based habitat conservation and species diversity

Objectives:

1. Avoid future ESA listings thru promotion of Best Management Practices.
2. Prevent major thru infrastructure development that has a significant and negative effect on the natural resource base of the watershed and that does not serve the community, i.e. major transmission lines, freeways, gaslines.
3. Work toward mutual trust and understanding among stakeholders.
4. Maintain unfragmented landscapes by promoting:
 - a. Intact habitat corridors

- b. Conservation of the watershed's flyways
 - c. Agriculture as a conservation use
 - d. Local culture
 - e. A sustainable inherent land ethic
 - f. Appropriate recreation
5. Incentivize conservation land uses
 6. Maintain or improve water resources
 7. Maintain a vigorous profitable agriculture base to keep the valley rural and sustainable.
 8. Encourage land uses that have positive effects on the whole watershed's natural resource base.

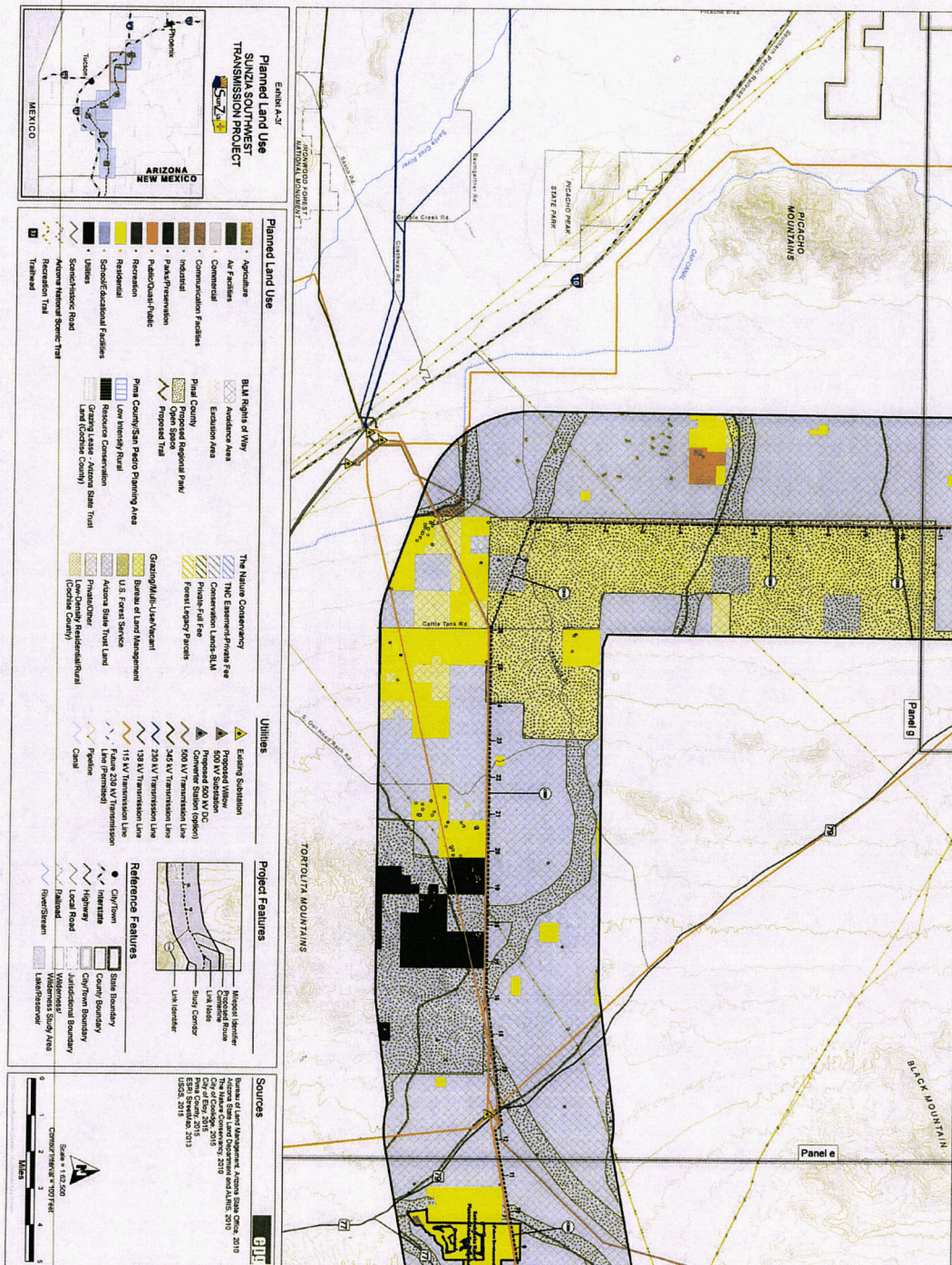
Major Resource Concerns Summary

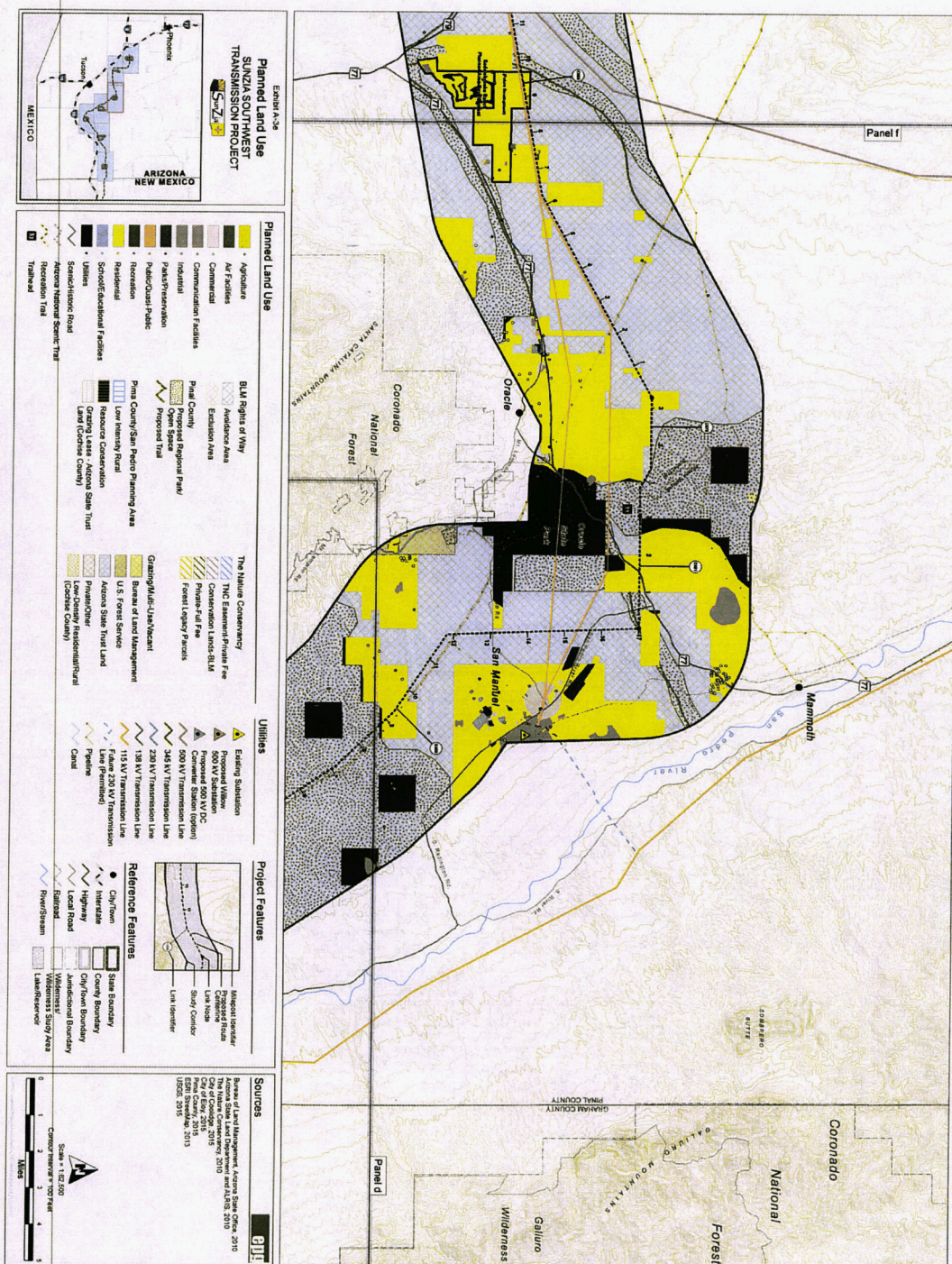
Current major resource concerns in the District include:

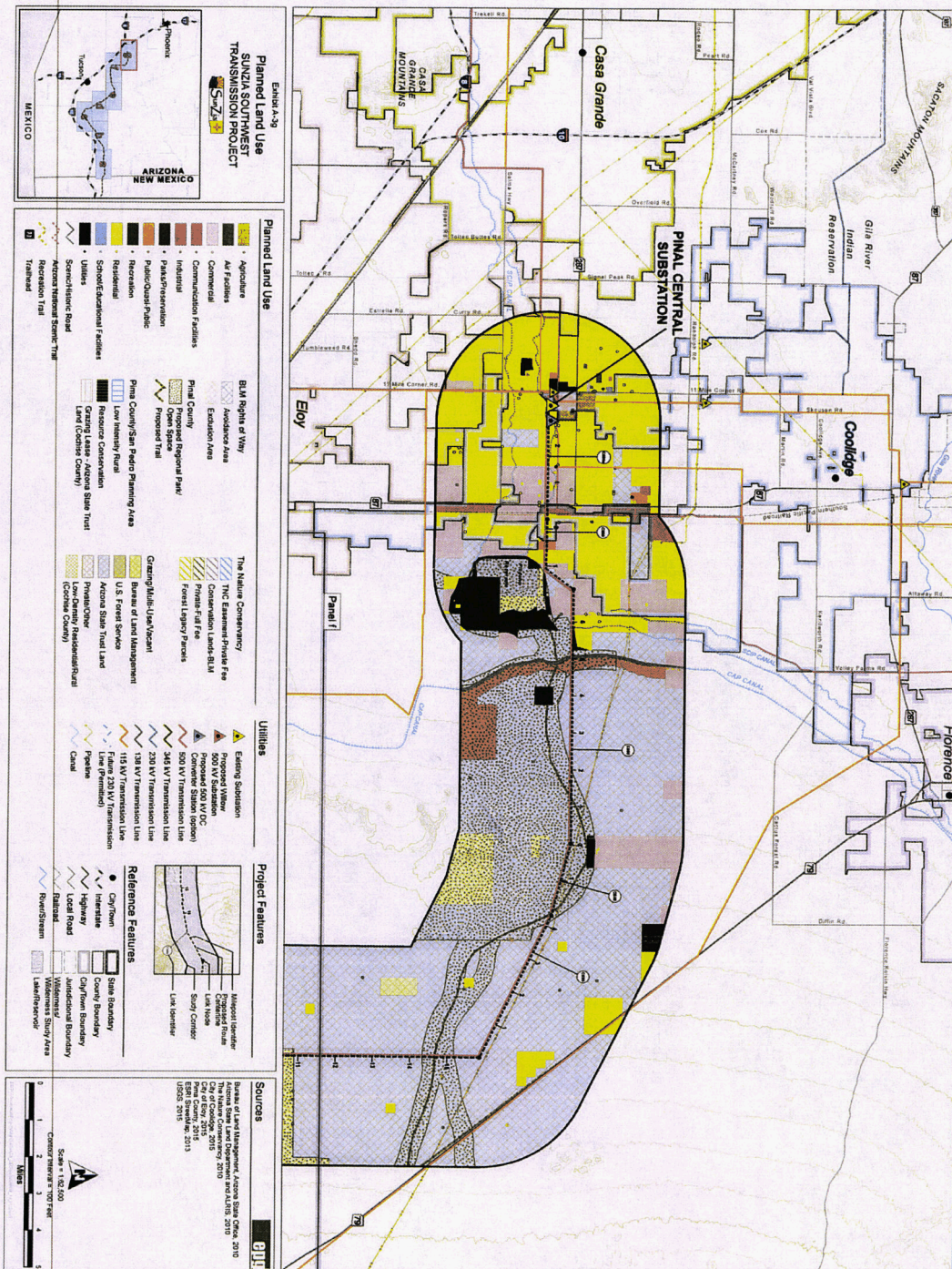
1. **Soil Erosion** – sheet, rill, wind, concentrated water flow, excessive bank erosion;
2. **Soil Condition** – compaction, degradation from salts and other contaminants;
3. **Water Quantity** – insufficient water use;
4. **Water Quality** – excessive nutrients, pesticide transportation and excessive sedimentation;
5. **Air Quality** – inefficient energy use, emission of particulate matter and precursors;
6. **Animal** – fish and wildlife habitat degradation, inadequate feed and forage, inadequate water;
7. **Plant Condition** – undesirable plant productivity and health, excessive plant pest pressure.

Source: 2012 WNRCD Field Report, page 11-11 & 44-95

https://wnrcd.files.wordpress.com/2014/01/final_wnrcd_field_report.pdf







Segment 4: Environmental Impacts and Natural Resource Issues

3. All new routes need to also be built using aerial construction. Along co-located routes, use existing roads wherever possible and eliminate as many roads as possible after construction. When not possible the following protocols to be used:

- a. Keep the disturbance above 3400 ft elevation wherever possible. That gets it up above the Sonoran Desert, where there is enough rain to get decent recovery.
- b. Make them blade the top 4-5 inches of soil anywhere they put a blade down and push that off topsoil to the side with clear instructions that the topsoil be protected at all costs for rehab. It is not to be disturbed once it is pushed off to the side. That top few inches of soil has all of the soil mycorrhiza, locally adapted seeds, bugs, etc needed for rehab. Any vegetation needed to clear should be pushed into that layer as well for organic matter.
- c. Reshape everything just like it was before construction. On any heavy loam to clay soils, bring in 4-6 inches of sandy loam soil for the uppermost layer. Some soil swapping will be necessary as they go.
- d. Once everything is shaped back to the original contours, topsoil that was set aside is to be spread back over the top of the disturbed area as uniformly as possible.
- e. Seed native grasses in the fall, mid October to mid November. No less than 8 species. Drilled wherever possible, broadcast where needed at twice the seeding rate of drilled areas.
- f. Straw wattles installed on the contour to minimize any runoff and prevent the erosion. The spacing depends on the % slope. These will also help keep vehicles off for a while, so more is better. Unknown what cows do with wattles. If they try to eat them, the operator will be compensated for keeping them out of the area for a couple years.
- g. Install drift fences alongside all existing roads and washes their disturbed area crosses, so that people can't turn off the existing roads and washes onto their new disturbed area. Those fences should extend far enough above and below the disturbance to be a strong deterrent. Check the fences every 2 weeks for the first two years, and repair any damages.
- h. Upon notification of an area starting to erode, or of an area people are getting onto the disturbed area during the first 2 years, send out a crew within 2 weeks to repair any fences, install more wattles, and reseed.

Segment 4: Specific Environmental and Natural Resource Impacts

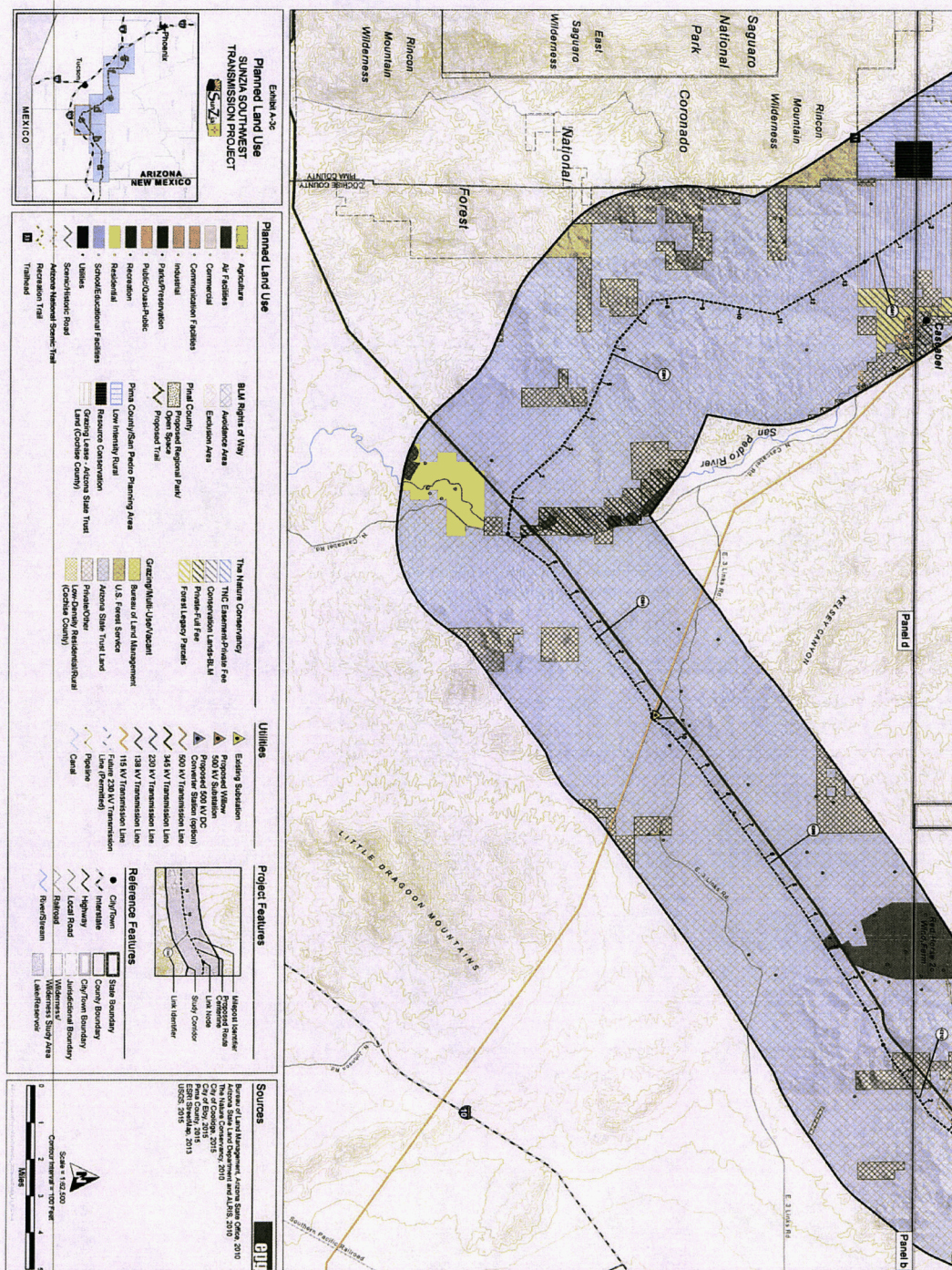
1. Impact of access roads on environment, maintenance of access roads on State and private lands.

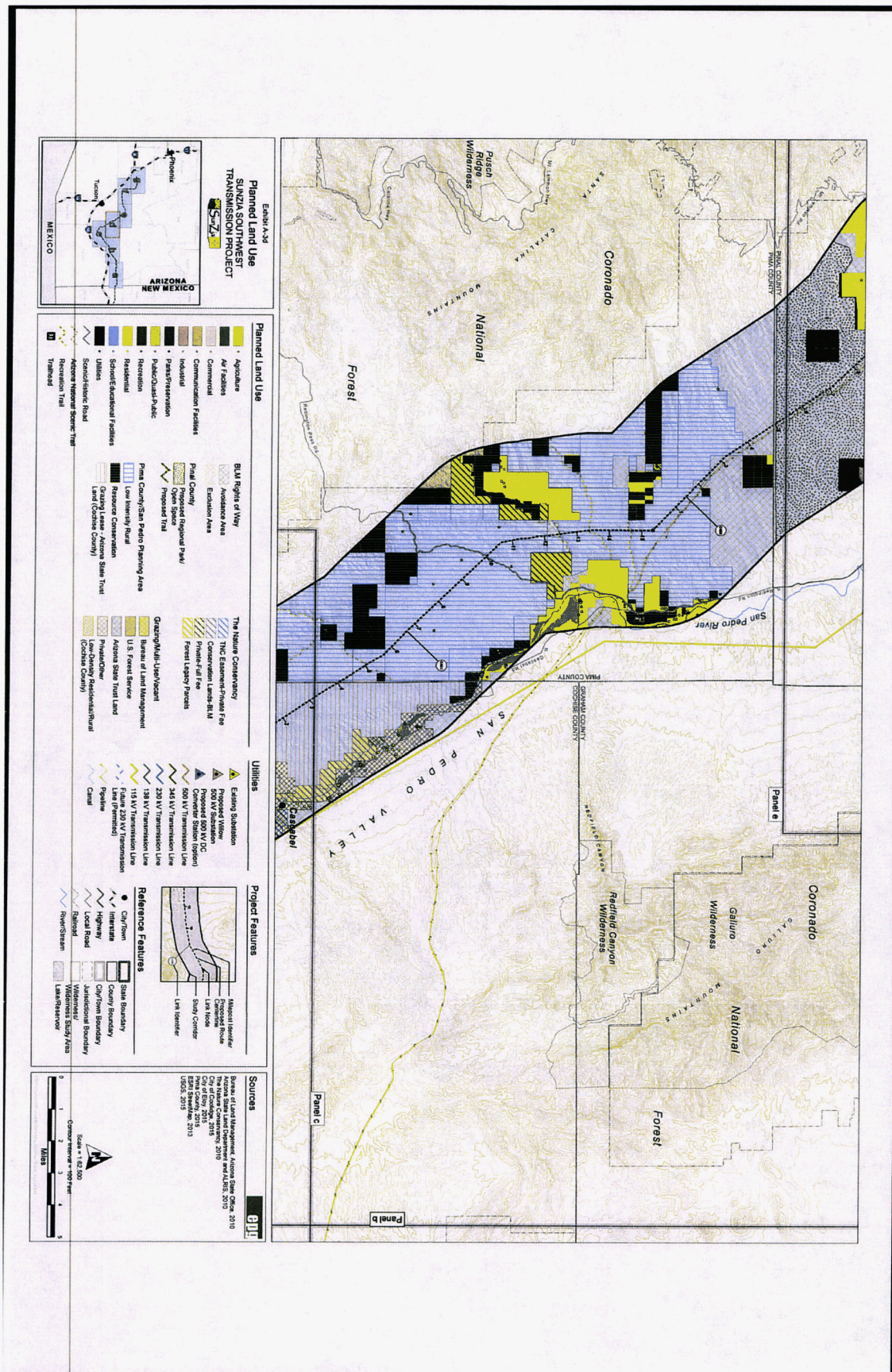
The impacts of roads is well known. Erosion, trash, incursions into unspoiled sensitive areas, introduction of non-native species, trampling of cultural resources. New roads are a gateway to illegal offroad travel. Maintenance and patrol is essential. Maintenance of the permitted road and patrol and obliteration of illegal roads that result from the legal ones.

2. Access roads relating to ongoing maintenance.

Access roads for maintenance should be signed at regular intervals to advise the public of Arizona's offroad rules. Sensitive areas should be drift fenced in strategic places and gated with locks, similar to gasline access roads.

3. Use of trucks and heavy equipment placement of structure.
 4. Removal of riparian vegetation and adverse impacts by riparian species in the desert. N.A.
 5. Water usage and impacts, adverse impacts on cultural resources. Cultural resources will be addressed by state law and monitored by SHPO. All other impacts to resources identified below should be mitigated in consultation with District.
 6. Visual quality.
 7. Flood plain issues and major washes.
 8. Impacts on soil.
 9. Impacts on sensitive water resources.
 10. Vulnerability of soil.
 11. Soil conditions are vulnerable to damage.
 12. Future land use options would be compromised.
 13. Impacts on wild life.
- Use Best Management Practices described in: *Ranching and Sonoran Desert Tortoise Working Group. Best Management Practices for Ranching in Sonoran desert tortoise (Gopherus morafkai) habitat in Arizona. 41 pp. plus appendices.*





Segment 3: Environmental Impacts and Natural Resource Issues

Along San Pedro. Highly erosive soils with opportunity for major erosion during construction and long term, for maintenance. The only way to mitigate is to carry all materials and equipment to all construction sites by air. All sites must be presurveyed for SDT and other species of concern and use Best Management Practices for removal of any species. Afterward, there can be no roads constructed for maintenance. At the end of the construction, each site needs to be rehabilitated using plant species recommended by the district. Construction gathering sites need to be rehabilitated likewise unless it is on private land. Public dirt roads used for bringing in materials need to be maintained according to county specs and watered to keep down dust.

Even with these measures, there is the likelihood of erosion on the new routes. Those routes need to be monitored for many years and mitigated per district guidelines. Alternately, the applicant can pay for monitoring and mitigation by district. The new route along the San Pedro is for the most part is within the ecotone between the upper Sonoran and the Sky Island conifer transition zone. The importance of this ecotone for southern Arizona species is vitally important. If this route becomes a new utility corridor it will destroy that ecotone, one of the most important ones in the southwest. It is vital that the Line Siting Committee declares that this will not become a utility corridor and will resist any further areas of developments that will compromise the ecotone.

Specific Environmental Impacts & Natural Resource Issues Segment 3

A listing of specific environmental and natural resource impacts.

- a. Impact of access roads on environment, maintenance of access roads on State and private lands. It has been the experience of the districts that roads are the major cause of new erosion. Even older roads that were properly engineered, without regular maintenance, become sources of erosion. Therefore the applicant should be required to maintain the construction and maintenance roads for the life of the project.
- b. Access roads relating to ongoing maintenance. See previous section.
- c. Use of trucks and heavy equipment placement of structure.

Pinal County is a non-attainment county for PM 10 particulates. During construction, all roads, new and existing must be watered to keep down dust. The gathering sites also must be watered to keep down dust. All equipment should be cleaned with high pressure water upon arrival to district in order to remove any invasive seeds brought from other places the equipment was previously working. Also, equipment must be inspected for fuel and oil leaks and all leaks repaired before use, re: Ranching and Sonoran Desert Tortoise Working Group. Best Management Practices for Ranching in Sonoran desert tortoise (*Gopherus morafkai*) habitat in Arizona. 41 pp. plus appendices.

- d. Removal of riparian vegetation and adverse impacts by riparian species in the desert.

This doesn't affect route through the WNRCD for the riverine portion, if any riparian vegetation is encountered outside of the river bottom, they should contact affected landowner or district to see how to mitigate.

- e. Water usage and impacts, adverse impacts on cultural resources. Rules are dictated by SHPO.
- f. Visual quality.

This is less important than land erosion, but more important for property values and therefore, the tax base.

- g. Flood plain issues and major washes.

Major washes normally have legal or illegal roads in them. That being the case, it is better to transport using these roads and rehabilitate rather than build new roads.

- h. Impacts on soil.

Compaction on roads must be mitigated before re-vegetation. Roads and subsequent rehabilitation must be engineered in consultation with districts

- i. Impacts on sensitive water resources and watersheds. Same as above.
- j. Vulnerability of soil.
- k. Soil conditions are vulnerable to damage.
- l. Impacts on wild life. Impacts on wildlife are addressed in VIII.3.l.
- m. Future land use options would be compromised.

If rehabilitation and maintenance is properly done by or with the advice of the districts, future land use compromise will be reduced, except for those industries that depend on an uninterrupted view, i.e. recreation.

Winkelman NRCD Request for Assurances

1. Assurances.
 - a. Bonding
 - b. Written into Plan of Development
 - c. Proof of Applicant's financial capacity. Many questions remain about the applicant's ability to finish this project; therefore, all mitigations and assurances must be memorialized and documents in the CEC permit. These should be heavily weighted upfront and made conditional to the successors-in-interest to the applicant.
 - d. Attorney fees for cost related to this application to district now and for future good faith lawsuits pertaining to SunZia
2. Construction and maintenance for materials and labor
 - a. Along the San Pedro River, and other new routes, there shall be no ground disturbance beyond the concrete bases for the towers and anchor wires.
 - b. Cable will be strung using helicopters All materials for construction would be flown in.
 - c. All maintenance to be done without land vehicles
 - d. On co-located routes , applicant must use existing roads, possibly closing some and must rehabilitate them
 - e. Field construction yards (large cleared areas for construction material storage) must be located on stable soils along existing roads with consideration given to threatened/endangered/protected species habitat.
 - f. All construction must be ground-truthed and must be sensitive to historical and cultural sites, to erodible soils, invasive plant species spread and endangered/threatened/protected animal and plant species.
 - g. Dust abatement and control.
 - h. Non-point source pollution control.
 - i. Best management practices for tortoise and any other species of concern must be developed, reviewed and utilized during survey, construction and maintenance.
3. Direct advisement capacity from the districts for site construction and rehabilitation:
 - a. Appropriate re-vegetation
 - b. Erosion Control
 - c. Maintenance

- d. Development of Best Management Practices for endangered, threatened, protected species
- 4. Long Term conservation investment-the value defined by the route's mileage and impact.
 - a. This utility will require constant monitoring for effects below (downstream) from the project. It will increase local off-road traffic for the foreseeable future that will expand from the footprint of the project. There are no provisions in the Plan of Work for that offsite monitoring and remediation. The Districts are and can be take on that task. It will require a long term investment from the Applicant. Costs estimated to be \$50,000 per year for twenty years.
 - b. Even though the Sonoran Desert tortoise (SDT) has recently been removed from the Endangered Species list candidate species, it continues to be a protected species and probably will be petitioned again in the near future. In past decisions by the U.S. Fish and Wildlife Service, predators, specifically ravens were considered a threat to the species. Ravens use power lines for perches while scouting for prey. Therefore the power lines will be seen as and be blamed for increased predation to the SDT. The Districts have a long history of providing science to the agencies to help them make their decisions. The Applicant should invest in the Districts' project of monitoring all the Arizona Game and Fish transects around the state continue monitoring tortoise population and health. This will also directly benefit the Applicant. Cost estimated to be \$200,000.
 - c. Attorney fees.

Revenue-Tax Summary

The mining industry still provides the major employment for residents in the District as well as State and Federal Prison systems in Florence as well as other employment in nearby metropolitan areas generates most of the revenues within these communities.

The second largest source of revenue within the District is livestock, agricultural, and agronomic related businesses. There are 24 farm units and 50 ranch units that utilize 795,155 acres or 97% of the land resource. Much of the mining property is used in conjunction with livestock grazing. Agronomic croplands, approximately 4,920 acres, produce varied commodities. Listed in respective order of acres planted these crops are: irrigated pasture, hay, small grains, grain sorghum, cotton, pecans, apples, citrus, and smaller amounts of other varied crops.

Recreation and related services generate little revenue within the communities of the District even though the District land resources and physical improvements are exploited for their use. Revenues that are brought into the District by these related industries are generally in the form of salaries to technicians and employees who are on temporal assignment. Most site specific improvements, recreational and game habitat improvements, are made with monetary funds that are mainly generated from outside sources; while the majority of the beneficial land improvements, conservation, and restoration programs are achieved with monetary resources obtained from land resources within the District. The District tax base of private property and improvements, fees, and other fixed and variable expenditures produce substantial revenues for the communities in the District and various government agencies.

Subpart A - Locally Led Conservation

Executive Summary

Locally led conservation consists of a series of phases that involve community stakeholders in natural resource planning, implementation of solutions, and evaluation of results. Locally led conservation begins with the community itself, working through the local conservation district. It is based on the principle that community stakeholders are best suited to deal with local resource problems. Generally, the locally led process will involve the phases listed below.

Phase	Activity	Further Information
1. Public Involvement and the Conservation Needs Assessment	The conservation district leads the effort to gather public input from a broad range of agencies, organizations, businesses, and individuals in the local area who have an interest in natural resource conditions and needs. These community stakeholders evaluate natural resource conditions in a conservation needs assessment and establish broad conservation goals to meet those needs.	Section 500.3.
2. Conservation Action Plan	The conservation district involves community stakeholders developing and agreeing on a conservation action plan that documents decisions and time schedules, identifies priorities, sets goals, and identifies Government and nongovernment programs to meet those needs. Community stakeholders, under conservation district leadership, identify which Government and nongovernment programs are needed to address specific natural resource concerns. Note: USDA conservation programs are just some of the many programs that can be used to satisfy the community's goals and needs.	Section 500.4.
3. Implementation of the Conservation Action Plan	Community stakeholders, under conservation district leadership, obtain Government and nongovernment program resources and assist in implementing the programs that can satisfy the community's goals and needs, as identified in the action plan.	Section 500.5.
4. Evaluation of the Conservation Action Plan	The effectiveness of plan implementation should be evaluated to ensure that the community stakeholders' planned goals and objectives are achieved. An evaluation should be made to determine where the actual results differ from those anticipated.	Section 500.6.











